



*City of Raleigh*  
*North Carolina*

July 30, 2008

David B. Foster, PE  
NCDOT Environmental and Planning Branch  
1553 Mail Service Center  
Raleigh, NC 27699-1553

Subject: City of Raleigh Comments, Southeast High Speed Rail Study Tier II Draft Environmental Impact Statement

Dear Mr. Foster:

This letter contains the City of Raleigh's comments on the proposed grade separations and street closings as presented to City staff on April 17, 2008 by representatives of NCDOT and their consultants. The comments are based solely on that presentation and subsequent maps submitted to staff highlighting the grade crossings in question.

For consistency with work performed to date, the City's comments are organized using the same format as the scoped impact categories used in the Tier I DEIS. The City's comments are limited to the following categories:

- Community characteristics, including:
  - Barrier effects
  - Aesthetics
  - Compatibility with community goals
  - Safety and grade crossings
  - Mobility and accessibility
- Economy
- Land Use
- Displacement and relocation
- Utilities
- Physical Environmental Resources/Visual character
- Alternatives to the proposed action



This letter has been prepared with the participation of the following City of Raleigh departments:

- City Manager
- City Planning
- Public Utilities
- Public Works

The City of Raleigh wholeheartedly supports the efforts to bring high speed passenger rail service to the city, to the region, and to downtown. The City has committed funds and staff to plan for a Multi-Modal Transportation Center in the Boylan Wye area, of which SEHSR is a significant future component. Federal and State funds have also been used to plan for the Multi-Modal Transportation Center, and NCDOT has been a partner in its development to date. However, the City has many concerns and issues regarding the current SEHSR proposal and believes the current plan for the corridor as it traverses downtown has significant adverse impacts to the City.

### **Overview of Affected Area**

The area under consideration generating the greatest concern is the segment traversing downtown Raleigh along the Seaboard "S" line from Peace Street south to the Boylan Wye. The downtown area contains numerous grade crossings as well as grade-separated crossings. Existing grade crossings include West Street, Harrington Street, Jones Street, and Hargett Street. Existing grade separated crossings include Peace Street, Capital Boulevard, Hillsborough Street, and Morgan Street.

As per the presentation, new grade separations are proposed throughout the affected area. Some streets are targeted for closure, while others are proposed to be raised on bridges over the existing rail corridor. The grade of the rail corridor will stay unchanged. Streets proposed for closure are Jones Street and West Street, and streets proposed for grade separation are Harrington Street and Hargett Street. However, it is our understanding that the grade separation of Harrington Street may be technically infeasible, and therefore a pedestrian-only alternative has been proposed. There have also been discussions between the design team and City staff regarding the potential extension of Lane Street to Glenwood Avenue that would span the rail corridor.

### **Discussion of Impacts**

#### **Community Characteristics**

**Barrier effects:** The street grid within downtown Raleigh is already interrupted in several locations by the existing rail infrastructure. The proposed street closings will greatly exacerbate the current lack of connectivity within the street grid, effectively severing one of downtown's most vibrant districts, Glenwood South, from the rest of downtown. The barrier effects will be both physical, impacting vehicles and pedestrians; and psychological, arising from the inability to circulate effectively from place to place. Between Glenwood South and more easterly parts of downtown, there will be opportunities for east-west connections between Hillsborough Street and Peace Street, a distance of 3,500 feet or seven city blocks. The result will effectively cleave the downtown area in two and prevent the various downtown districts from growing together as a cohesive whole.

**Aesthetics:** Within the downtown, the proposed bridges will have an extremely negative visual impact on parts of the downtown currently receiving some of its largest private investment in development. There are seven new mixed-use, hotel and residential projects under construction or consideration within or adjacent to the affected areas. The proposed flyover crossings would have severe negative visual impacts beyond the boundaries illustrated in the presentation, disrupting important view corridors, blocking the views from adjacent residential uses, hotels and restaurants. A large piece of modern infrastructure, raised above the right of way in a dense city center, will itself have difficult aesthetic challenges. The elevated roadways also potentially create problem areas for maintenance and safety below the structures in an urban setting.

**Compatibility with community goals:** The City has a long standing policy to not to close streets within the original downtown grid laid out in 1792. This project specifically proposes to close Jones Street, which is one of the State's most important ceremonial corridors and home to the NC Legislature, the Governor's Office, and the most visited State museums, which receive over one million visitors annually. The City has emphasized Jones Street as a principal pedestrian corridor in downtown Raleigh. While the draft plan has proposed constructing a pedestrian overpass to mitigate the impacts, the City's adopted Downtown Urban Design Guidelines strongly discourages any type of pedestrian flyovers within the downtown. Removing pedestrians from the street level has negative impacts on adjacent ground level retail and restaurant uses. More broadly, the City has also targeted the area north of the rail corridor as an important growth area and the proposed configuration will cut this area off both visually and operationally from the rest of downtown.

**Safety and grade crossings:** There are numerous examples in other American cities of at-grade rail crossings supporting transit and freight movement that coexist with vehicular and/or pedestrian traffic. The City of Charlotte recently began operation of its light rail system on its South Corridor. This system operates trains with 15-minute headways in each direction and supports numerous at-grade crossings for both vehicles and pedestrians within and adjacent to their downtown area.

While the City understands the benefits of a "sealed corridor" in certain contexts like high-speed rail operation, the proposed service will be operating at low speeds in downtown Raleigh due to the existing track geometry and the fact that the trains will be entering or leaving the station at this location. As the travel characteristics of the trains and the tracks will be different outside of downtown, the City has not objected to the proposed grade separations elsewhere in the City.

All of the existing grade crossings in downtown Raleigh currently operate with a very positive safety record and very few accidents. The additional traffic generated by the proposed SEHSR traffic does not seem to warrant this level of infrastructure investment and community impacts, specifically when the trains will be operating at low speeds entering and departing the station area.

**Mobility and accessibility:** The current at-grade crossings in downtown function acceptably from the City's standpoint with regards to mobility and traffic efficiency. Each of these crossings support approximately 3,000 - 5,000 trips per day while experiencing closings associated with current freight and intercity rail traffic. The durations of additional gate closings associated with the SEHSR project will be minimal due to the short length of each train.

The proposed street closures would force the trips making the existing crossings to other locations and may lead to higher amounts of congestion at other locations. Portions of the downtown street network already function near capacity and are incapable of additional widening due to existing urban development patterns.

The proposed street closures will also adversely impact other modes of transportation. The City is currently in the process of planning a downtown transit circulator system to connect the various parts of downtown. A loss of connectivity in this area will severely hinder the City's ability to consider options for this service. The proposed closures will also dramatically impact the walkability of this area. The existing connection between Glenwood South and the Powerhouse District (Jones/West area) would be severed; it is unlikely that the proposed mitigation of a proposed pedestrian overpass will be functionally effective. Additionally the removal of the existing at-grade crossings would impact the existing bicycle route network that currently traverses this area.

## Economy

Over the past five years, Downtown Raleigh has gone from economic stagnation to one of the most active areas of investment in the State. Following the adoption of the Downtown Livable Streets plan, downtown has been on the receiving end of nearly \$3 billion in public and private investment. Two significant recent additions to the City's skyline include Progress Energy's second office tower and the Royal Bank of Canada's new U.S. headquarters on Fayetteville Street. These are strong examples downtown's newfound market strength.

Within and in the immediate vicinity of the affected area, there have been numerous new developments, all of which have been led by the private sector. Approved and constructed projects include:

- The Quorum office and residential tower (\$35 million)
- The West residential tower (\$70 million)
- The Powerhouse Plaza hotel and office tower (\$50 million)
- The Bloomsbury's two residential towers (\$55 million)
- 222 Glenwood residential tower (\$35 million).

In addition, there are several public and private projects in the development phase that will represent approximately \$500 million in additional new investment. All of these new planned projects would be adversely affected by the uncertainty of the impacts of the proposed closings and flyovers.

## Land Use

The emerging land use pattern in downtown Raleigh is characterized by dense multi-story buildings featuring a mix of uses: apartments and condominiums, offices, hotels, and ground-floor retail. This development pattern is highly beneficial, as it is compact, efficient in its use of energy and infrastructure, and supportive of multi-modal trip generation. This development pattern is facilitated by downtown's block patterns and interconnected street grid, which assists pedestrian circulation and disperses traffic rather than concentrating it on a few routes. The proposed loss of connectivity within the downtown could negatively impact the City's ability to accommodate and attract these types of positive land uses.

## Displacement and relocation

The footprints of the impacts associated with the proposed overpasses were reviewed with City staff. Many of these physical impacts would have substantial impacts on existing buildings and developments that could not be replaced due to slope maintenance requirements. This creates irreplaceable losses in revenue to the City with the loss of taxable land in an area with the highest land values in the City. Even if retaining walls are employed to reduce the footprints, the resulting loss of access to properties may still create the same impacts. For example, the newly constructed West residential condominium tower would potentially lose access to its parking deck entrance on Harrington Street with the proposed grade-separation scenario included in the current plans.

## Utilities

Water mains, sanitary sewer mains, and their appurtenances such as fire hydrants, meters, and service connections exist along the street rights-of-way where all grade separations are proposed. Additional fill material and/or bridge support structures for the grade separations will likely conflict with the existing utilities and require significant utility relocations or replacements. These utilities provide water and sewer service to the customers in the vicinity and must be kept in service during construction. Provisions to maintain service such as temporary water mains and services, temporary sewer services, and sewer bypass pumping will be required. A large diameter water distribution main (12"-16") exists within the street right-of-way at nearly every proposed grade separation road and will require relocation.

Outside of the downtown area, the City has additional concerns regarding the large diameter water transmission mains that exist along Atlantic Avenue (36") and along Durant Road (24"). The fill required for the New Hope Church Road bridge appears to impact the New Hope Church/Atlantic intersection area and will require a detailed investigation to determine the severity of the impacts. The 24" water transmission main along Durant Road appears to be in direct conflict and will require relocation. The water transmission mains are critical components of the water system. Service interruption will have to be carefully planned, closely coordinated with the CORPUD staff, and performed during low flow periods (winter months) at night. Resolution of the conflicts with the utilities will have significant cost implications.

## Proposed Alternatives

The City of Raleigh is also concerned with the apparent lack of consideration given to alternatives which would either avoid or substantially mitigate many of the impacts described above.

## Alternate Alignments

Norfolk Southern has an existing rail right of way to the west of the proposed right of way that is already grade separated except for the Jones Street crossing. Using this line to pass through the downtown would eliminate most of the negative impacts associated with the new flyovers. This alternative would also avoid disrupting the connectivity to areas north of the proposed right of way and may actually provide opportunities to improve connectivity north of Peace Street. In addition all of the new and proposed projects along this Norfolk Southern right of way have been designed to mitigate the impacts of the existing rail operations.

## Alternate Treatments

While the project team has focused exclusively on sealing the corridor to support the SEHSR service, there has been little technical evaluation of the effects of leaving the existing crossings in place. In the City's previous discussions with Triangle Transit regarding their proposed service at these same crossings, only closure of the Hargett Street crossing was discussed. Neither Triangle Transit nor the associated rail companies approached the City regarding any limitations to the Jones Street, West Street, or Harrington Street crossings. In fact the discussions of these crossings involved means of improving the crossings for pedestrians and improving their compliance with ADA regulations. We would suggest that similar evaluations need to be conducted for these crossings.

## Conclusions

In conclusion, the City of Raleigh feels that there will be serious adverse impacts to its downtown area from the current proposals to seal the SEHSR corridor. These impacts will negatively affect our community character, economic development, existing and future land uses, and the transportation system as a whole. While the City remains strongly in support of the SEHSR project and its proposed downtown station, more investigation of potential impacts, alternatives, and appropriate mitigation is required. The City of Raleigh looks forward to collaborating with NCDOT further on these matters in the coming months.

Yours truly,

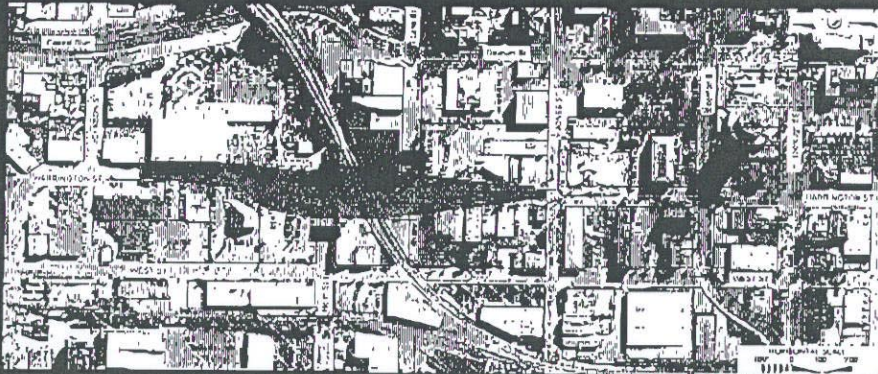
Charles Mecker,  
Mayor

Cc: Russell Allen – City Manager  
Mitchell Silver, AICP – Planning Director  
Carl R. Dawson, Jr., PE – Public Works Director  
Dale Crisp, PE – Public Utilities Director

**Southeast High Speed Rail  
Proposed Crossing Alignments**

**Harrington Underpass**

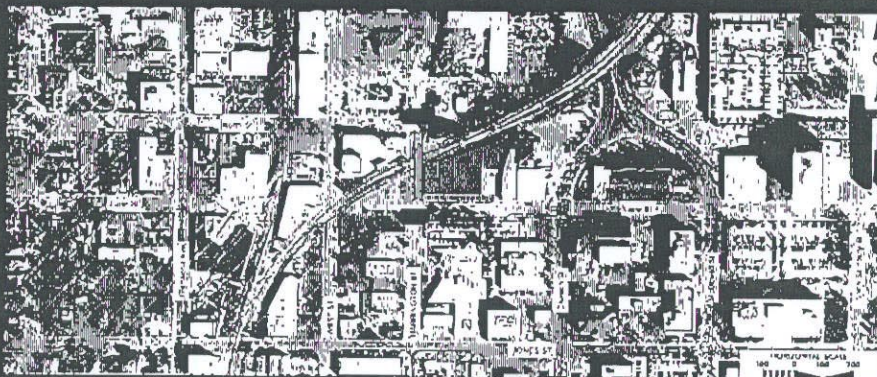
**Closes North and Lane Streets @ Harrington**



**Southeast High Speed Rail  
Proposed Crossing Alignments**

**Harrington Pedestrian Underpass**

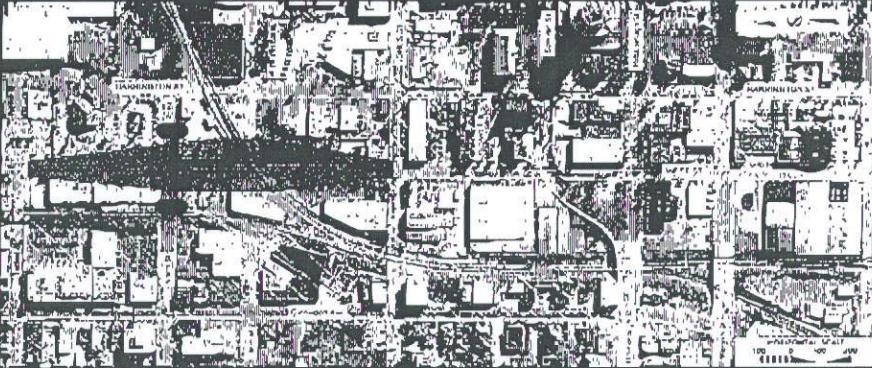
**Closes Harrington @ North and Lane**



**Southeast High Speed Rail  
Proposed Crossing Alignments**

**West Underpass**

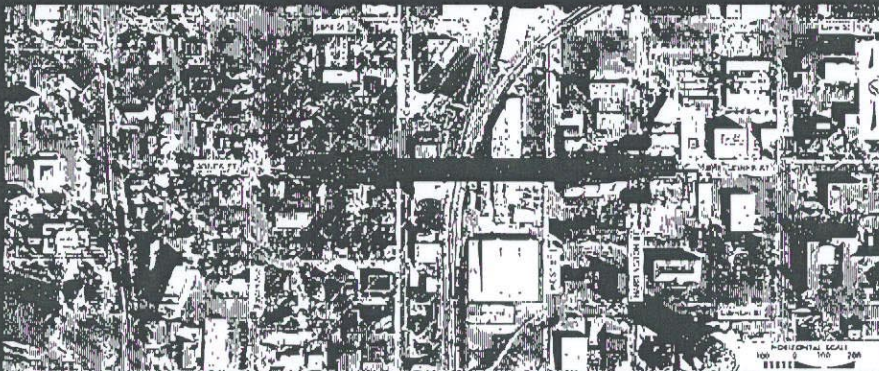
**Closes North Street @ West**



**Southeast High Speed Rail  
Proposed Crossing Alignments**

**Jones Flyover Long Bridge Option**

**Closes Harrington @ Jones Street**

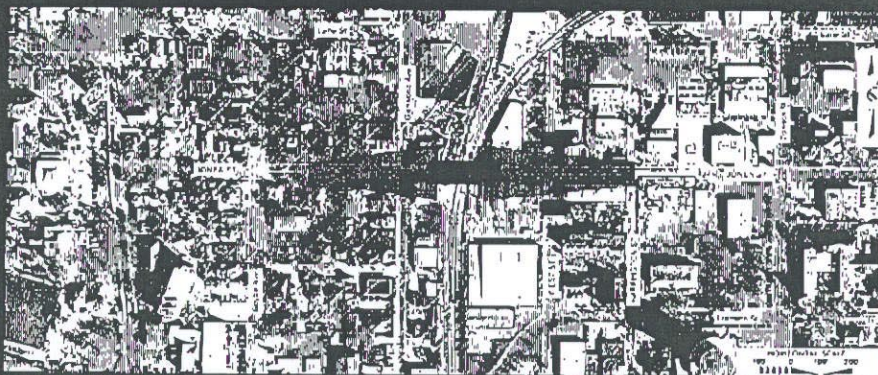




**Southeast High Speed Rail  
Proposed Crossing Alignments**

**Jones Flyover Short Bridge Option**

**Closes West @ Jones Street**



**Southeast High Speed Rail  
Proposed Crossing Alignments**

**Jones Pedestrian Only Flyover**

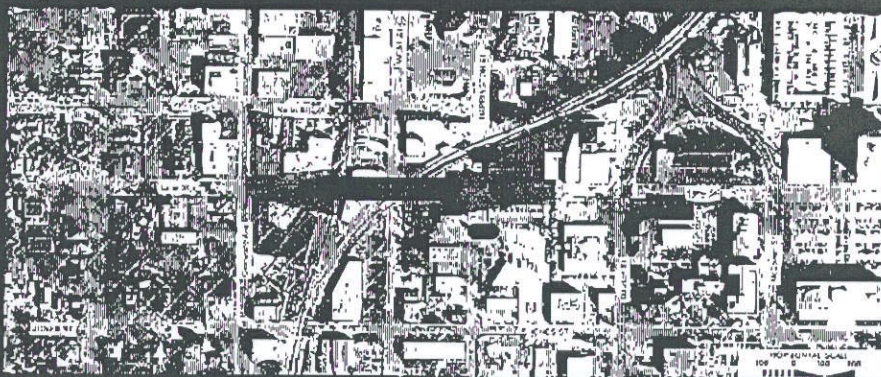
**Closes Jones Street to Vehicles @ Glenwood and West**



Southeast High Speed Rail  
Proposed Crossing Alignments

**Lane Street Short Bridge Flyover**

Closes Harrington @ Lane Street



Southeast High Speed Rail  
Proposed Crossing Alignments

**Parking Deck Pedestrian Flyover**

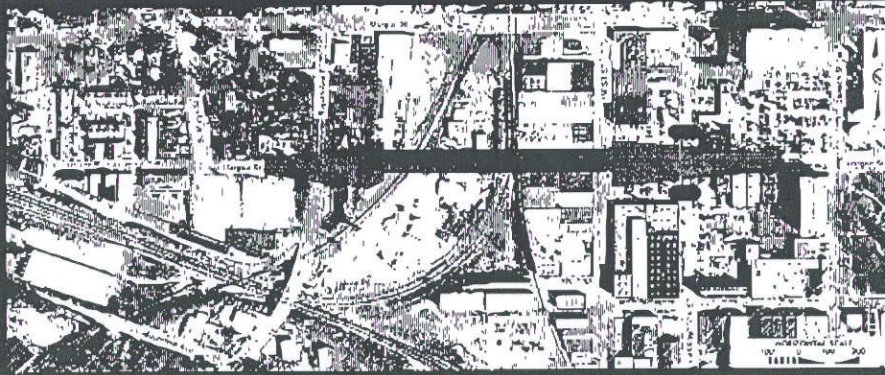
Creates a Pedestrian Crossing @ Powerhouse Square Deck



**Southeast High Speed Rail  
Proposed Crossing Alignments**

**Hargett Street Long Bridge Flyover**

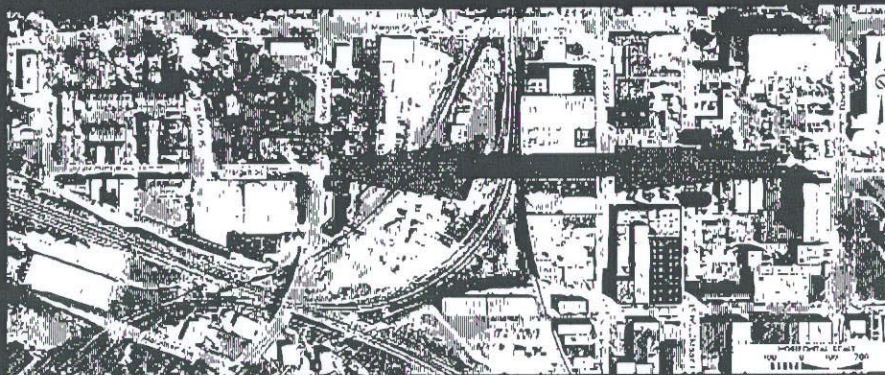
**Closes Harrington Street @ Hargett**



**Southeast High Speed Rail  
Proposed Crossing Alignments**

**Hargett Street Short Bridge Flyover**

**Closes Harrington Street @ Hargett**



**Southeast High Speed Rail  
Proposed Crossing Alignments**

**Norfolk  
Southern  
ROW Option**

**Only Closes Jones Street  
All Other Crossings Already  
Grade Separated**

**May Allow Additional  
Openings North of Downtown  
Connecting Glenwood to  
Capital Boulevard**

